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Attorneys for Defendant
Molina Healthcare, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WESTON REED, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

MOLINA HEALTHCARE, INC. and CR
INSURANCE GROUP, LLC,

Defendants.

Case No. 3:21-cv-01851-JD

**STIPULATION UNDER LOCAL RULE 6-1(b)
EXTENDING THE TIME FOR MEDIATION**

Plaintiff Weston Reed (“Plaintiff”) and Defendants Molina Healthcare, Inc. (“Molina”) and CR Insurance Group, LLC (“CR Insurance”) (collectively, the “Parties”) submit the following stipulation pursuant to Local Rule 6-1(b).

RECITALS

WHEREAS, on July 1, 2021, Plaintiff and Molina submitted a Joint Statement Regarding the Plan for Alternative Dispute Resolution, agreeing to have Jill R. Sperber, Esq. serve as the mediator in this action (ECF No. 33);

WHEREAS, on July 2, 2021, CR Insurance also filed its agreement to have Ms. Sperber serve as the mediator in this matter (ECF No. 34);

WHEREAS, on July 7, 2021, the Court issued an order directing the Parties to participate in private mediation as jointly proposed (ECF No. 35);

WHEREAS, the current deadline for the Parties to hold the mediation under ADR Local Rule 3-7 is October 5, 2021;

WHEREAS, based on Ms. Sperber and the Parties' availabilities, the Parties' mediation is scheduled to occur on October 7, 2021;

WHEREAS, the Parties' counsel agreed to extend the current deadline for the mediation by two days pursuant to Local Rule 6-1(b).

STIPULATION

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, pursuant to Local Rule 6-1(b), that:

1. The time for the Parties to hold a mediation shall be extended by 2 days until October 7, 2021; and

2. Nothing herein shall be deemed a waiver of any rights or defenses by any party.

Dated: October 5, 2021

COOLEY LLP

By: /s/ Kathleen R. Hartnett
Kathleen R. Hartnett

Attorney for Defendant
Molina Healthcare, Inc.

Dated: October 5, 2021

BURSOR & FISHER, P.A.

By: /s/ Frederick J. Klorczyk III
Frederick J. Klorczyk III

Attorney for Plaintiff
Weston Reed

1 Dated: October 5, 2021

ELP GLOBAL PLLC

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3 By: /s/ Vincent B. Lynch
4 Vincent B. Lynch

5 Attorney for Defendant
6 CR Insurance Group, LLC

7 **ATTESTATION REGARDING SIGNATURES**

8 Pursuant to Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on whose
9 behalf the filing is submitted, concur in the filing's content and have authorized the filing.

10 Dated: October 5, 2021

COOLEY LLP

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13 By: /s/ Kathleen R. Hartnett
Kathleen R. Hartnett

14 Attorney for Defendant
15 Molina Healthcare, Inc.

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17 **PROPOSED ORDER**

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19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 DATED: _____

21 _____
22 The Honorable James Donato
United States District Judge

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